

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,)	
)	
Plaintiff,)	
v.)	C.A. No. 1:21-cv-01456-MN
)	
CHANBOND, LLC, DEIRDRE LEANE,)	
and IPNAV, LLC,)	
)	
Defendants.)	

**DEFENDANTS DEIRDRE LEANE AND IPNAV, LLC’S
UNOPPOSED MOTION TO FILE UNDER SEAL**

Defendants Deirdre Leane and IPNAV, LLC (collectively, the “Leane Defendants”) respectfully move this Court pursuant to Federal Rule of Civil Procedure 5.2, and Local Rule 5.1.3 for entry of an order authorizing the Leane Defendants to file their response to Plaintiff CBV, Inc.’s Emergency Motion for Extension of Time to Respond to Leane Defendants’ Motion for Judgment on the Pleadings (the “Extension Motion”), and exhibits thereto, under seal. Plaintiff does not oppose this relief.

On October 15, 2021, CBV filed a Motion to Seal the Complaint (D.I. 1). The Court granted CBV’s Motion to Seal on October 15, 2021 (D.I. 4). CBV subsequently filed a First Amended Complaint (D.I. 6) on December 6, 2021 under seal. The Leane Defendants filed their Answer, Counterclaims, and Crossclaims under seal on March 23, 2022 (D.I. 41). Plaintiff/Counterclaim Defendant CBV filed its Answer to the Leane Defendants’ Counterclaims under seal on April 13, 2022 (D.I. 79).

The First Amended Complaint, the Leane Defendants’ Answer, Counterclaims, and Crossclaims, and CBV’s Answer to the Counterclaims contain information regarding the parties’ confidential business information. The Leane Defendants’ response to the Extension

Motion will contain the same or similar confidential information. Accordingly, the Leane Defendants respectfully submit that good cause exists to seal their response (and exhibits thereto) to the Extension Motion to protect the interests of one or more parties against public dissemination of the confidential information contained within the pleadings.

The Leane Defendants will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system, including the requirement to file a redacted version within seven (7) days of filing the sealed document.

The Leane Defendants therefore respectfully request entry of the attached order permitting the filing of their response to the Extension Motion (and exhibits thereto) under seal.

OF COUNSEL:

Akiva M. Cohen
Dylan M. Schmeier
KAMERMAN, UNCYK,
SONIKER & KLEIN P.C,
1700 Broadway, 16th Floor
New York, NY 10019
212.400.4930
acohen@kusklaw.com
dschmeier@kusklaw.com

Dated: June 1, 2022

Respectfully submitted,

/s/ James H. S. Levine
James H. S. Levine (DE No. 5355)
TROUTMAN PEPPER
HAMILTON SANDERS LLP
Hercules Plaza, Suite 5100
1313 N. Market Street
P.O. Box 1709
Wilmington, DE 19899-1709
302.777.6500
james.levine@troutman.com

Attorneys for IPNAV, LLC and Deirdre Leane

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2022, I filed the foregoing Deirdre Leane and IPNAV, LLC's Unopposed Motion to File Under Seal using CM / ECF, which will send notification of such filing to all counsel of record.

/s/ James H. S. Levine
James H. S. Levine (DE No. 5355)

CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

I hereby certify, pursuant to D. Del. LR 7.1.1, that reasonable efforts have been made to reach agreement with opposing counsel on the matters set forth above, and Plaintiff CBV, Inc. does not oppose Defendants Deirdre Leane and IPNAV, LLC's Motion to File Under Seal.

Dated: June 1, 2022

/s/ James H. S. Levine
James H. S. Levine (DE No. 5355)